IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

NOVARTIS PHARMACEUTICALS CORPORATION, NOVARTIS CORPORATION, AND NOVARTIS AG)))
Plaintiffs,	Civil Action No. 12-03967 (SDW) (MCA)
v. WOCKHARDT USA LLC; and WOCKHARDT LTD.)) Motion Day: May 6, 2013)
Defendants.))
NOVARTIS PHARMACEUTICALS CORPORATION, NOVARTIS CORPORATION, AND NOVARTIS AG Plaintiffs, v. SUN PHARMA GLOBAL FZE AND SUN PHARMACEUTICAL INDUSTRIES LIMITED Defendants.)))) Civil Action No. 12-04393 (SDW) (MCA)) Motion Day: May 6, 2013))))

NOVARTIS PHARMACEUTICALS CORPORATION,

Plaintiff,

v.

ACTAVIS LLC; APOTEX, INC.; APOTEX, CORP.; GLAND PHARMA LTD.; DR. REDDY'S LABORATORIES, INC.; DR. REDDY'S LABORATORIES LTD.; EMCURE PHARMACEUTICALS USA, INC.; EMCURE PHARMACEUTICALS, LTD; HOSPIRA, INC.; PHARMACEUTICS INTERNATIONAL INC.; SAGENT PHARMACEUTICALS, INC.; ACS DOBFAR INFO S.A.; STRIDES, INC.; AGILA SPECIALTIES PRIVATE LTD.; SUN PHARMA GLOBAL FZE; CARACO PHARMACEUTICAL LABORATORIES, LTD; SUN PHARMACEUTICAL INDUSTRIES LTD.; WOCKHARDT USA LLC; and WOCKHARDT LTD.

Defendants.

Civil Action No. 13-1028 (SDW) (MCA)

Motion Day: May 6, 2013

NOVARTIS PHARMACEUTICALS CORPORATION, Plaintiff,))))
v. ACCORD HEALTHCARE INC.; FRESENIUS KABI USA, LLC; and HIKMA FARMACEUTICA S.A.,) Civil Action No. 13-2379 (SDW) (MCA) Motion Day: May 6, 2013)
Defendants.))))

DECLARATION OF ROBERT W. TRENCHARD IN SUPPORT OF NOVARTIS'S REPLY BRIEF IN FURTHER SUPPORT OF ITS MOTION TO CONSOLIDATE

I, Robert W. Trenchard, declare as follows:

- I am a partner at Wilmer, Cutler, Pickering, Hale and Dorr LLP, 7 World Trade Center,
 250 Greenwich St., New York, NY 10007, and counsel for Plaintiff Novartis
 Pharmaceuticals Corporation ("Novartis") in the above-captioned matter.
- I submit this declaration in support of Novartis's Reply Brief in Further Support of Its Motion to Consolidate.
- 3. Attached hereto are true and accurate copies of the following exhibits:
 - (1) (SEALED) Transcript, Expedited Discovery Hearing (February 27, 2013)
 - (2) Request for Production, Wockhardt USA LLC and Wockhardt Limited's First Set of Requests for Production of Documents and Things (Nos. 1-117) (December 12, 2012)

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 6, 2013

Robert W. Trenchard